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*Of Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

**JOSEPH HABER, an individual; et al.,**

**3:17-cv-01827-PK**

**PLAINTIFFS,**

**v.**

**STIPULATED PROTECTIVE  
ORDER**

**CITY OF PORTLAND, a municipal corporation;  
et al.,**

**DEFENDANTS.**

Pursuant to Fed. R. Civ. P. 26(c)(1) and (2), it is hereby stipulated and agreed by and between the respective parties hereto by their counsel of record the following:

1. Any video or digital recording of the deposition of any plaintiff or defendant, or any officer, agent, employee or former employee of defendant City of Portland, shall be used only for purposes of this litigation.
2. No person shall disseminate the video or digital recording of a deposition to anyone not listed as an attorney of record, their legal assistants and support staff, or experts retained in this litigation. However, the parties agree that named plaintiffs and named defendants may view the video or digital recordings of depositions.
3. To the extent a video or digital recording of a deposition includes material designated for protection under the terms of the stipulated protective order previously entered in this matter (Dkt # 29) or any other similar order, such recording or portion thereof shall be filed under seal if used prior to trial. The use of any video or digital recording of a deposition at or after trial shall be subject to further order of the court.
4. This Stipulated Protective Order shall remain in effect until agreed otherwise by written stipulation signed by counsel for the parties hereto and filed herein, or until modified or terminated by order of this Court upon good cause being shown.

IT IS SO STIPULATED:

/s/ Steven M. Wilker  
 Steven M. Wilker | Sarah M. Einowski  
 Alexander M. Tinker | Megan R. Reuther  
*Cooperating Attorneys for ACLU Foundation  
 Of Oregon, Inc.  
 Attorneys for Plaintiffs*

Dated: June 7, 2018

/s/ Matthew dos Santos  
 Matthew dos Santos | Kelly Simon  
*Attorneys for Plaintiffs*

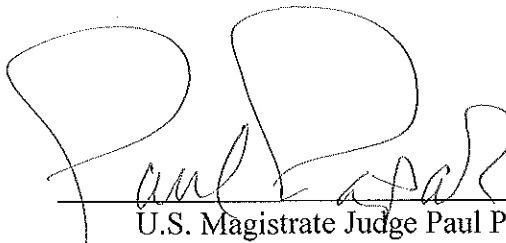
Dated: June 7, 2018

/s/ Naomi Sheffield  
 William W. Manlove | Naomi Sheffield  
*Attorneys for Defendants*

Dated: June 7, 2018

THIS STIPULATED PROTECTIVE ORDER IS HEREBY APPROVED.

DATED: June 7<sup>th</sup>, 2018.



U.S. Magistrate Judge Paul Papak